

Exhibit 16



Pennsylvania Money Transmitter Amendment Checklist (Company)

CHECKLIST SECTIONS

- [General Information](#)
- [Amendments](#)

GENERAL INFORMATION

Instructions

1. Pennsylvania Department of Banking and Securities (PA) does not require advanced notice for any changes; make the changes in NMLS as of the effective date and submit supporting documentation as instructed in the checklist below.
2. Licensees are required to keep all material information on file with NMLS current and accurate. If the information contained in the application or on file with the Pennsylvania Department of Banking and Securities changes in any material respect, the licensee must notify the Department of the change within 10 days after the change. Act 129 § 11.1(5)
3. Any change of address, change of name, or change in control person (including the qualifying individual) must also be reported on the Company and Individual application forms. Act 129 § 10(a)(8), 11.1(5)
4. There are no fees to file amendments.

Uploading Agency-Specific Documents

If you are required to upload documents to NMLS for an Advance Change Notice (ACN), select “Advance Change Notice” for the document type in the NMLS Document Uploads section. If you are required to upload documents for an amendment that doesn’t require ACN, select the applicable document type in the NMLS Document Uploads section.

Note: Use the recommended filing naming convention found on the [Document Upload Descriptions and Examples](#).

Helpful Resources

- [Amendments & Advance Change Notice](#)
- [Document Uploads Quick Guide](#)
- [Document Upload Descriptions and Examples](#)

Agency Contact Information

Contact PA Non-Depository licensing staff by phone at (717)787-3717 or send your questions via email to ra-asklicensing@pa.gov for additional assistance.

Documents that are required to be submitted outside of NMLS must be received within 5 business days of the electronic submission through NMLS. Please submit via email to ra-asklicensing@pa.gov or via mail at the following address: Act 129 § 10(a)(8)

For U.S. Postal Service and Overnight Delivery:
Pennsylvania Department of Banking and Securities
Non-Depository Licensing Office
Market Square Plaza 17 N 2nd St. Ste 1300
Harrisburg, PA 17101

AMENDMENTS

- [Change of Legal Name](#)
- [Change of Main Address](#)
- [Addition or Modification of Other Trade Name](#)
- [Deletion of Other Trade Name](#)
- [Change of Legal Status](#)
- [Addition or Modification of Affiliates/Subsidiaries](#)
- [Change to Books and Records Location](#)
- [Change of Disclosure Question\(s\)](#)
- [Addition of Direct Owners/Executive Officers, Indirect Owners marked as Control and Qualifying Individuals](#)

Note: Information uploaded or filed in NMLS will not be viewable to the agency until the filing has been attested to and submitted through NMLS. Agency-specific requirements that should be emailed or mailed to the agency on the checklist below must be received with the appropriate checklist within five (5) business days of the electronic submission of your filing through NMLS.

Complete	PA Money Transmitter License Change of Legal Name Amendment Items	Submitted via...
<input type="checkbox"/>	<p>Change of Legal Name: Submit an amendment for a change of Legal Name through the Company Form (MU1) in NMLS.</p> <p>Act 129 § 10(a)(1,3)</p> <p>If the company structure changes, (i.e. sole prop to Inc. or LLC to Inc. etc.) a new application must be completed.</p>	NMLS
Note	<p>Change of Legal Name Fee: \$0 per license</p> <p>Fees collected through NMLS are NOT REFUNDABLE OR TRANSFERABLE.</p>	N/A
<input type="checkbox"/>	<p>Formation Documents: Upload the following documents in NMLS:</p> <ul style="list-style-type: none"> • Registration of the full legal name with the Pennsylvania Department of State, Corporations Bureau, • The Corporate Charter or Articles of Incorporation (if a corporation), or • The Articles of Organization and Operating Agreement (if a Limited Liability Company), or • The Partnership Agreement (if a partnership of any form). <p>Act 129 § 10(a)(1,3)</p>	<p>Upload in NMLS: under the Document Type <u>Formation Document</u> in the <i>Document Uploads</i> section of the Company Form (MU1).</p>

Complete	PA Money Transmitter License Change of Main Address Amendment Items	Submitted via...
<input type="checkbox"/>	<p>Change of Main Address: Submit an amendment for a change of Main (Corporate) Address through the Company Form (MU1) in NMLS.</p>	NMLS
Note	<p>Change of Main Address: \$0 per license</p> <p>Fees collected through NMLS are NOT REFUNDABLE OR TRANSFERABLE.</p>	N/A

Complete	PA Money Transmitter License Addition or Modification of Other Trade Name Amendment Items	Submitted via...
<input type="checkbox"/>	Addition or Modification of Other Trade Name: Submit an amendment for an addition of or change to an Other Trade Name through the Company Form (MU1) in NMLS.	NMLS
Note	Addition of Other Trade Name \$0 per license. Fees collected through NMLS are NOT REFUNDABLE OR TRANSFERABLE.	N/A
<input type="checkbox"/>	Trade Name/Assumed Name Registration Certificates: Upload a copy of your proof of Registration of all trade names, with the Pennsylvania Department of State, Corporations Bureau. Act 129 § 10(a)(1,3) Questions: Contact the PA Department of State @ (888) 659-9962 or (717) 787-1057. This document should be named <i>PA Money Transmitter Trade Name – Assumed Name</i> .	Upload in NMLS: under the Document Type <u>Trade Name/Assumed Name Registration Certificates</u> in the <u>Document Uploads</u> section of the Company Form (MU1).

Complete	PA Money Transmitter License Deletion of Other Trade Name Amendment Items	Submitted via...
<input type="checkbox"/>	Deletion of Other Trade Name: Submit an amendment for deletion of an Other Trade Name through the Company Form (MU1) in NMLS.	NMLS

Complete	PA Money Transmitter License Change of Legal Status Amendment Items	Submitted via...
Note: In many cases, a change to the Fiscal Year End, Legal Status, and State or Date of Formation indicates a new entity has been formed and a new NMLS record is required. This includes the creation of a new NMLS account and submission of a new Company Form (MU1).		
<input type="checkbox"/>	Change of Legal Status: Submit an amendment for a change in Legal Status within the Company Form (MU1) in NMLS.	NMLS

Complete	PA Money Transmitter License Addition or Modification of Affiliates/Subsidiaries Amendment Items	Submitted via...
<input type="checkbox"/>	Addition or Modification of Affiliates/Subsidiaries: Submit an amendment for an addition or change in Affiliates/Subsidiaries within the Company Form (MU1) in NMLS.	NMLS

Complete	PA Money Transmitter License Change to Books and Records Location	Submitted via...
<input type="checkbox"/>	Change to Books and Records Location: A change in the address of business books and records to a location other than the principal place of business, when approved by the department through NMLS, is deemed an approved alternate site record keeping location for purposes of the Money Transmitter Act and will furthermore constitute as a valid change or termination of an existing alternate site record keeping location. Act 129 § 10(a)(1,3), 10.1(a)(8) This location must be reported in the <i>Books and Records</i> section of the Company Form (MU1).	NMLS

Complete	PA Money Transmitter License Change of Disclosure Question(s) Amendment Items	Submitted via...
<input type="checkbox"/>	Change of Disclosure Question(s): Submit an amendment for a change to Disclosure Question response(s) through the Company Form (MU1) in NMLS.	NMLS
<input type="checkbox"/>	Changing a Response from No to Yes: Provide a complete and detailed explanation and document upload for each response that changes from “No” to “Yes” for company or each control person. See the Company Disclosure Explanations Quick Guide for instructions.	Upload in NMLS in the <i>Disclosure Explanations</i> section of the Company Form (MU1) or Individual Form (MU2).
<input type="checkbox"/>	Changing a Response from Yes to No: When changing a Disclosure Question response from Yes to No, you will be required to remove the question from the associated Disclosure Explanation and provide an Amendment Reason. You must select “Add Explanation for “No” Responses” and provide an explanation for each response that changes from “Yes” to “No” for company or each control person. You must also upload a document (PDF) related to the explanation. See the Company Disclosure Explanations Quick Guide for instructions.	NMLS

NMLS ID Number	
Licensee Legal Name	

Complete	PA Money Transmitter License Addition of Direct Owners/Executive Officers, Indirect Owners marked as Control and Qualifying Individuals Amendment Items	Submitted via...
<input type="checkbox"/>	Addition of Direct Owners/Executive Officers, Indirect Owners marked as Control and Qualifying Individuals: Submit an amendment for an addition of Direct Owners/Executive Officers, Indirect Owners marked as Control and Qualifying Individuals within the Company Form (MU1) in NMLS. Act 129 § 11.1(5)	NMLS
<input type="checkbox"/>	Change in Business Ownership: Provide certified copies of all legal documents executed and associated with the change in ownership, including any applicable purchase and sales agreements, merger agreements, or consent to change in ownership agreements. Act 129 § 10(a)(8), 11.1(5)	Upload in NMLS: under the Document Type <u>Advance Change Notice</u> in the <i>Document Uploads</i> section of the Company Form (MU1).
<input type="checkbox"/>	Credit Report: Individuals in a position of <u>control</u> are required to authorize a credit report through NMLS. Individuals will be required to complete an Identity Verification Process (IDV) along with an individual attestation before a license request for your company can be filed through NMLS. Credit Report for Control Persons: \$15 per control person. 7 Pa.C.S. § 6133(e)(5); 6138(a)(3)	NMLS
<input type="checkbox"/>	Individual Memorandum of Tax Certification: Provide a certified memorandum for each control person (including the qualifying individual) indicating all tax obligations to the Commonwealth of Pennsylvania have been paid or that a deferred payment plan with the Pennsylvania Department of Revenue has been made. <u>Click to download tax waiver and certification form.</u> Act 129 § 4(c)(4)	Email to: <u>RA-AskLicensing@pa.gov</u>
<input type="checkbox"/>	Pennsylvania Criminal Background History Check: Each control person named in the Direct Owners / Executive Officers section and the Qualifying Individual listed on the Company (MU1) form must complete a Pennsylvania State Police (PSP) criminal background check by using the Pennsylvania Access to Criminal History (PATCH) website. Please follow the directions on the form carefully. <u>Results will not be accepted more than 30 days prior to the application submission date.</u> Pennsylvania State Police Criminal History Background Check: \$22.00 for each request and is payable through PATCH by credit card. <u>Click to download PA State Police Criminal Background History Instructions.</u> 7 Pa.C.S. § 6133(d); 6138(a)(3)	Email to: <u>RA-BNBACKGROUNDCHECK@pa.gov</u>

Complete	PA Money Transmitter License Addition of Direct Owners/Executive Officers, Indirect Owners marked as Control and Qualifying Individuals Amendment Items	Submitted via...
<input type="checkbox"/>	<p>Criminal Background Check: Authorization for an FBI criminal history background check for each control person (including the qualifying individual) to be completed in NMLS. 7 Pa.C.S. § 6138(a)(3).</p> <p>After you authorize the FBI criminal history background check through the Individual Form (MU2), you must schedule an appointment to be fingerprinted.</p> <p>See the Completing the Criminal Background Check Process Quick Guide for information.</p> <p>Note: If you are able to 'Use Existing Prints' to process the FBI criminal history background check, you DO NOT have to schedule an appointment. NMLS will submit the fingerprints already on file and the background check will begin to process automatically.</p> <p>MU2 Individual FBI Criminal Background Checks: \$36.25</p> <p>As determined by each state agency, Control Persons, Direct Owners, Indirect Owners, Executive Officers, Branch Managers, and Qualifying Individuals are required to submit a CBC through NMLS.</p> <p>7 Pa.C.S. § 6133(d); 6138(a)(3)</p>	<p>NMLS</p>
<input type="checkbox"/>	<p>Third Party Investigatory Background Checks: In addition to the Pennsylvania and Federal Criminal Background Checks, a control person and/or Qualifying Individual <i>who does not or has not resided in the US for at least 5 years</i> must provide an investigative background report. The report must be prepared by an acceptable search firm and submitted directly to the Department in addition to other background information required in the application.</p> <p><u>Results will not be accepted more than 30 days prior to the application submission date.</u></p> <p>At a minimum, the report must contain the following:</p> <ul style="list-style-type: none"> • A comprehensive credit report/history • Civil court and bankruptcy court records for the past 5 years, including a search of the court data in the country(ies), states, towns where the individual resided and worked and in contiguous areas. • Criminal records for the past 5 years, including felonies, misdemeanors and violations including a search of court data in the countries, states, towns where the individual resided and worked and in contiguous areas. <p>Click to download Third-Party Investigatory Background Check Instructions.</p> <p>7 Pa.C.S. § 6133(d); 6138(a)(3)</p>	<p>Email to:RA-BNBACKGROUNDCHECK@pa.gov</p>